

2012 ANNUAL AIR MONITORING NETWORK PLAN CHECKLIST

Blue = fields that would be filled in during ANP review

No.	ANP requirement	Citation within 40 CFR 58	Was the info submitted? If yes, page #s	Action if info is missing or incorrect	Does it meet the req?	Action if req. is not met (assumes correct info submitted)	Notes (for now on req. but ultimately for review notes)	Inform s network adeq?	Critical for ANP app? ¹
1	July 1 st due date	58.10 (a)(1)		Request plan be submitted ASAP.		ANP approval can happen within 120 days of when delinquent plan is received	shall submit	N	N
2	<u>Specify monitors that are part of SLAMS, NCore, STN, State speciation, in serious, severe and extreme ozone nonattainment areas, PAMS, and SPM</u>	<u>58.10(a)(1)</u>		<u>Specify monitors known of that were not included and request these be included in the next applicable ANP. Request table showing all applicable monitors.</u>		<u>N/A</u>		<u>N</u>	<u>N</u>
3	Statement of purpose for each monitor	58.10 (a)(1)		Add/correct in following year's plan	Yes if correct info was	No impact on current year's approval	Shall include	N	N

¹ Identify critical criteria for approval. All else is WOE.

Critical is based on:

- 40 CFR 58.10 says “must include” or “shall provide”
- 40 CFR 58, App A – pick the critical ones and all else WOE
- 40 CFR 58, App C – ID as critical if requirement is “must”
- 40 CFR 58, App D – ID as critical if requirement is “must”
- 40 CFR 58, App E – none are critical since these need to be followed “to the extent possible”

Comment [e1]: I think this checklist should be year specific and get revised each year to reflect any changes occurring to the regs from the previous year.

Comment [e2]: Generally speaking, I think it would be good to include an intro section to the checklist that includes clear definitions for each of the columns and instructions on how to use the checklist.

Comment [e3]: Suggest we number each of these checks for easy to identification purposes.

Comment [e7]: Would a plan be disapproved if any of these critical criteria denoted with a “Y” are not met? It would be good to include instructions up front to make this clear.

Comment [e8]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m4]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e5]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [e6]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [e9]: When would request go out and in what format? I would suggest start by sending an email from AQAO manager no later than one month after the plan is late (i.e. August 1). Monitoring staff reminders can go out sooner.

Also, at any point if the plan is not submitted (maybe by Nov 1), could this constitute an automatic disapproval?

Comment [e10]: I would suggest this to try to encourage agencies to include a table in their ANP that shows the various types of monitors they are including in their network plans.

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					submitted				
Etc.	30-day public comment / inspection period ²	58.10 (a)(1), 58.10 (a)(2)		Put out for comment and resubmit		EPA provide comment period	Shall/must provide	N	Y
	List of modifications to SLAMS network	58.10 (a)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted, (assumes we are not approving the changes in ANP)	N/A – req. met if correct info submitted	Subject to approval by RA	N	Y
	NCore plan submitted to Admin. by 7/1/2009	58.10 (a)(3)		Ask for plan ASAP	N/A – HQ app.	N/A – HQ app.	Shall HQ app.	N	N
	NCore site operational by 1/1/2011	58.10 (a)(3)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ... HQ app.	N	Y
	Pb plan for ≥1.0 tpy sources by 7/1/2009	58.10 (a)(4)		Ask for (correct) plan ASAP and withhold approval of that portion		If the submitted plan does not meet the requirements: withhold	Shall	N	Y

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Comment [e11]: I would suggest we describe here how the agency went about meeting this requirement. For example, we can say something like “included in detailed site description tables” or “included in separate section.”

Comment [e12]: Literally speaking, it is not necessary that this be provided as a list.

Comment [e13]: If agencies are able to provide sufficient justification in the ANP for modifications, I would like to see us move towards being able to act on these in the Network Plan letters.

Comment [e14]: The NO2 response language developed for this year's plan specifically states that we are not acting on NCore, PAMS, STN, and NO2. I would suggest that if we run into a case where an NCore plan needs to be submitted, we pass this over to OAQPS to take appropriate action given that it is not a regional requirement. I'm on the fence as to whether or not it should even be considered as one of our checks for approval.

Same comment for other NCore, PAMS, STN, and NO2 checks.

² Comment period required by either EPA or S/L/T agency if modifications are proposed to the SLAMS network. Otherwise an inspection period is required by the S/L/T agency.

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						approval of that portion			
	Pb site for ≥1.0 tpy sources operational by 1/1/2010	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ...	Y	Y
	Pb plan for 0.5-1.0 tpy by 7/1/2011	58.10 (a)(4)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
	Pb site for 0.5-1.0 tpy sources operational by 12/27/2011	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for ...	Y	Y
	NO2 plan for area-wide and RA40 sites by 7/1/2012	58.10 (a)(5)		Ask for <u>sites to be identified in 2013 ANP plan ASAP</u>		2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N
	NO2 area-wide and RA40 sites operational by 1/1/2013	58.10 (a)(5)		<u>Ask for confirmation of operation in 2013 ANP</u> add/correct in following year's plan and withhold approval of that portion.		Withhold approval of that portion	Plan shall provide for ...	Y	Y
	NO2 plan for near-road sites by	58.10 (a)(5)		Ask for plan <u>that goes through</u>		2012: Withhold approval of that	Shall HQ app.	N	N

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Comment [e15]: I'm unsure of the purpose of this here and for the rest of the NO2 related checks just below.

Meredith- can you explain how we might use this?

Comment [e17]: I don't think we could consider this a critical criteria for R9's ANP approval, this year at least. If the regs change to make this an RA approval, then I would say it becomes critical.

Comment [e16]: This is already specified in "Action if req. is not met" column.

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	7/1/2012?			public notice ASAP		portion since HQ app.			
	NO2 near-road sites operational by ?	58.10 (a)(5)		Include/Add/cor et in following year's ANP or separate plan when submitted and withhold approval of that portion		Withhold approval of that portion ?	Plan shall provide for ...	Y	N Y
	SO2 plan for PWEI sites by 2011	58.10 (a)(6)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
	SO2 sites operational by 1/1/2013	58.10 (a)(6) and 58.13(d)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for...	Y	Y
	CO plan for 2015 near-road sites by 7/1/2014	58.10 (a)(7) and 58.13(e)(1) 2		Ask for plan by 7/1/2014ASAP		If the submitted plan does not meet the requirements: withhold approval of that portionTo be determined for 7/1/2014 plan reviews.	Shall	N	N Y
	CO sites operational	58.10		Add/correctInclu		Withhold	Plan shall	N Y	N Y

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Comment [e18]: Since CFR currently states this, I think it is fine to specify this date. Next year if we have something different, we can update.

Comment [e19]: Again, I don't think we could consider this critical in our regional review this year.

Comment [e22]: Again, unsure of what the notes in this column means here and for other CO checks below.

Comment [e23]: Change to Y for 2014 ANP.

Comment [e24]: Not critical for 2012 plans, becomes critical for 2014 plans.

Comment [e20]: Alternatively, since this is not a requirement until 7/1/2014, it is not necessary to comment on this during this year's review. Any comments that we include would only be a courtesy reminder.

Comment [e21]: When the time comes, I imagine we would probably want to discuss how to go about acting on inadequate CO near-road plans as well as defining criteria for what would make an adequate plan.

Comment [e25]: Change to Y for 2014 ANP.

Comment [e26]: Not critical for 2012 network plans, becomes critical in 2014.

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	by 1/1/201 ⁵⁶	(a)(7 ²) and 58.13(e)(1) 2		de in following year's ANP or separate plan when submitted and withhold approval of that portion		approval of that portion	provide for...		
	CO plan for 2017 near-road sites by 7/1/2016	58.10 (a)(7) and 58.13(e)(2) 2		Ask for plan by 7/1/2016		To be determined for 7/1/2016 plan reviews.	2	N	N
	CO sites operational by 1/1/2017	58.10 (a)(7) and 58.13(e)(2) 2		Include in following year's ANP or separate plan when submitted.		Withhold approval of that portion	2	N	N
	AQS site identification number for each existing and proposed site	58.10 (b)(1)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Location of each existing and proposed site: street address and geographic coordinates	58.10 (b)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Sampling and analysis method(s) for each measured parameter	58.10 (b)(3)		Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	N	Y

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Comment [e28]: Change to Y for 2016 ANP.

Comment [e29]: Becomes critical for 2016 ANP.

Comment [e27]: Alternatively, since this is not a requirement until 7/1/2016, it is not necessary to comment on this during this year's review. Any comments that we include would only be a courtesy reminder.

Comment [e30]: Change to Y for 2016 ANP.

Comment [e31]: Becomes critical for 2016 ANP.

Comment [g33]: Should the 58.10 stuff be combined with the App. D 1.1 stuff? (Like, all the stuff they might have in the individual site tables could be grouped together in this checklist?)

Comment [e34]: I am confused at the meaning of this for this column.

Comment [e32]: Including for consistency with CFR language.

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	Operating schedule for each monitor	58.10 (b)(4)		Add/correct in following year's plan and withhold approval of that portion		If operating schedule does not meet req: withhold approval of that portion (can be monitor specific)	Must contain following information	Y	Y
	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted, (assumes we are not approving the changes in ANP)	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Monitoring objectives ³ for each monitor as defined in Appendix D	58.10(b)(6); App. D		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Scale of representativeness for each monitor as defined in Appendix D			Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Identification of sites suitable and sites not suitable for	58.10 (b)(7)		Add/correct in following year's plan and withhold		N/A – req. met if correct info submitted	Must contain following information	Y	Y

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Comment [e35]: I would think this to be a Y here. It would help to define up front what this column is speaking to.

³ Site type is considered later.

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	comparison to the annual PM2.5 NAAQS as described in Part 58.30			approval of that portion					
	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	The designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Any source-oriented Pb site for which a waiver has been granted by EPA RA	58.10 (b)(10)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Any Pb monitor for which a waiver has been requested or granted by EPA RA for us of Pb-PM10 in lieu of Pb-TSP	58.10 (b)(11)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Identification of required NO2 monitors as either near-road or area-wide	58.10 (b)(12)		Add/correct in following year's ANP plan and withhold approval of that portion		Withhold approval of that portion 2 (HQ)	Must contain following information	Y	Y
	Document how	58.10 (c)		Add/correct in	Yes if	If the process	must	N	Y

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Comment [e36]: Again, I can envision a Y here since several of our minimum monitoring requirements are assigned at the CBSA/MSA level.

Comment [e37]: I know this is a tricky one, but I actually do believe it would be appropriate in this case for R9 to be the one to withhold approval since this is a requirement for the ANP which goes to the RA. To me, this requirement is simply stating that the S/L agencies are required to identify the number of near-road and area-wide monitors they should be operating.

Comment [e38]: Again, confused by this column.

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	states and local agencies provide for the review of changes to a PM2.5 monitoring network that impact the location of a violating PM2.5 monitor. ⁴			following year's plan and withhold approval of that portion	correct info was submitted	for the review of changes to the PM2.5 network does not meet the req: withhold approval of that portion.			
	Plan to modify the network that complies with findings of the 5-year network assessment. [Note: can be submitted on year of network assessment or year after.]	58.10 (e) 58.14 (a)	Only applies to year of or after 5-year network assessment	Add/correct in following year's plan and withhold approval of that portion	Yes if plan was submitted, either with ANP or separately	If the plan would result in not meeting other requirements then withhold approval of that portion.	Shall develop and implement. Final plan subject to approval by RA.	N	N
	All additions and discontinuations of SLAMS have been subject to approval according to 58.14	58.10 (e)		Withhold approval of that portion. Work separately with agency to obtain information needed to approve modification and approve outside ANP process.		If modification does not meet req: withhold approval of that portion.		Y for some sites: DV, high conc, co-located, etc.	Y

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Comment [e40]: I could say Y here since a plan with modifications should allow for the network to remain adequate.

Comment [e39]: I see the logic, but don't see how it is required to be submitted on a particular date. A date needs to be clarified in the regs.

⁴ The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

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				List in following year's plan.					
	Data submitted to AQS	58.16		for ANP			No regulatory req. in 58.10 or App A, C, D, or E for this in ANP		
	Precision/Accuracy reports submitted to AQS	App. A		Add/correct in following year's plan.		N/A – req. met if correct info submitted	Must => WOE	N	N
	Annual data certification submitted	App. A		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	Must => WOE	Y	Y
	Frequency of flow rate verification for manual PM samplers audit	App A, 3.3.2		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	
	Frequency of flow rate verification for automated PM analyzers audit	App A, 3.2.3		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
	Frequency of one-point flow rate verification for Pb samplers audit	App A, 3.3.4.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		

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Comment [m41]: This is not required to be in ANP and I don't know how we'd check so I suggest removing

Comment [e42]: Agree.

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	Frequency of one-point QC check (gaseous)	App. A, 3.2.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Date of last Annual Performance Evaluation (gaseous)	App. A, 3.2.2		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Dates of last two semi-annual flow rate audits for PM monitors	App A 3.2.4 and 3.3.3		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Dates of last two semi-annual flow rate audits for Pb monitors	App A 3.3.4.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	PM2.5 co-location			Add/correct in following year's plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
	PM10 co-location			Add/correct in following year's plan and withhold		If co-location does not meet requirement	Must => WOE	Y	Y

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Comment [m43]: Is PM10 co-location required?

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				approval of that portion.		then withhold approval of that portion.			
	Pb co-location	App. A 3.3.4.3		Add/correct in following year's plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
	PM10-2.5 co-location	App. A 3.3.6		Add/correct in following year's plan. If site hosted, may request for this to be included in next applicable plan.		If co-location does not meet requirement then withhold approval of that portion. N/A- HQ action	Must => WOE	N	N
	PM2.5 PEP audits	App. A (3.2.7)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
	Pb PEP audits	App. A (3.3.4.4)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
	NPAP audit	App. A (?)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
	Instrument/monitoring method code for each monitor: is it reported properly? Is it reported correctly (i.e., appropriate method code for regulatory monitors)?	App. C		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	must	Y	Y
	Optional request to	Proposed		Assume all FEM		If the evidence		Y	Y if request

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Comment [e44]:

Comment [e45]: Since this is handled on a national scale, I don't think we could take action on this at the regional level unless HQ specifically asked the region to include a comment. I think all we could ask for is that if an agency was hosting one of these collocations, they should include this in the ANP.

Comment [m46]: Need this ref.

Comment [m47]: Are any of these App. A requirements critical vs WOE?

No.	ANP requirement	Citation within 40 CFR 58	Was the info submitted? If yes, page #s	Action if info is missing or incorrect	Does it meet the req?	Action if req. is not met (assumes correct info submitted)	Notes (for now on req. but ultimately for review notes)	Inform s network adeq?	Critical for ANP app? ¹
	have PM2.5 continuous instruments treated as non-FEMs and therefore not comparable to NAAQS?	rule and memo		instruments are comparable to NAAQS (see previous item)		to treat FEMs as non-FEMs is not compelling; withhold approval of that portion and treat all FEMs as regulatory monitors			is included
	Start date for each monitor	App. C		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	Y – info is needed for valid DV determ. but can be obtained from AQS	Y
	Instrument monitor type for each monitor			Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		Y – ID non-reg. monitors	Y
	Monitoring objective for each instrument	App. D 1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	N	Y
	Site type for each instrument	App. D 1.1.1		Add/correct in following year's plan and withhold approval of that	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	Y

Comment [e3]: Suggest we number each of these checks for easy to identification purposes.

Comment [e7]: Would a plan be disapproved if any of these critical criteria denoted with a “Y” are not met? It would be good to include instructions up front to make this clear.

Comment [e8]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

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				portion.					
	Instrument parameter code for each instrument			Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		Y	Y
	Instrument parameter occurrence code for each instrument			Add/correct in following year's plan.	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	N
	Sampling season	App. D		Add/correct in following year's plan and withhold approval of that portion.		If sampling season does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
	Sampling schedule for PM2.5	58.12(d)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
	Sampling schedule for PM10	58.12(e)		Add/correct in following year's plan and withhold		If sampling schedule does not meet	must	Y	Y

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Comment [m48]: Needed for PM2.5? Maybe just change this to PM2.5 POC?

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				approval of that portion.		requirements or a deviation has not been approved: withhold approval of that portion			
	Sampling schedule for Pb	58.12(b)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:6 unless waiver	Y	Y
	Sampling schedule for PM10-2.5	58.12(f)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:6 unless waiver	N	Y
	Minimum monitoring requirements met for O3	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that	must	Y	Y

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						portion			
	Minimum monitoring requirements met for NO ₂	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	NY
	Minimum monitoring requirements met for SO ₂	App. D section 4.4		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
	Reporting/collecting max 5 minute average per hour for SO ₂	58.12(g), 58.16(g)					No regulatory req. in 58.10 or App A, C, D, or E for this in ANP		
	Minimum monitoring requirements met for CO	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	NY	NY
	Minimum monitoring requirements met for Pb, including for Pb at NCore	App. D section 4.5; 58.13(a)		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that	must	Y	Y

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Comment [e49]: I don't think we have the authority to judge this in 2012 plans.

Comment [m50]: This is not required to be in ANP and I don't know how we'd check so I suggest removing

Comment [e51]: These won't begin to kick in until 2014 ANP reviews.

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	Minimum monitoring requirements met for PM2.5	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
	Minimum monitoring requirements met for PM10	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
	Minimum monitoring requirements met for PM10-2.5			Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	N	Y
	Distance of site from nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action <u>or</u> document deviation in waiver request.	followed to the maximum extent possible	N	N
	Traffic count of nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Groundcover	App. E		Add/correct in		Suggest	followed to	N	N

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Comment [e52]: Same comment for remainder of App. E checks.

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				following year's plan.		corrective action.	the maximum extent possible		
	Probe height	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from supporting structure	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from obstructions on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from obstructions not on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from trees	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance to furnace or incinerator flue	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance between collocated monitors	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Unrestricted airflow	App. E		Add/correct in following year's		Suggest corrective	followed to the maximum	N	N

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				plan.		action.	extent possible		
	Probe material (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Residence time (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N

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Use a weight of evidence approach.

Based on the information that is in the Annual Network Plan, [EPA has determined that the Annual Network Plan meets the requirements listed in 40 CFR 58.10, except for ...]

Comment [m53]: Use R1 language for this.

Identify action if deficient (request for next-year's plan, disapprove portion, address issue and resubmit, etc.)

Identify which have to be met for network adequacy vs. ANP approval (if there is a difference) or just which inform network adequacy.

Comment [e54]: I like that these instructions are provided, however I would like to see them in more of a step by step fashion and in more detail.